

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,  
STATE OF MINNESOTA,  
STATE OF CALIFORNIA,  
STATE OF NORTH CAROLINA,  
STATE OF TENNESSEE,  
STATE OF TEXAS, and  
STATE OF UTAH,

No. 0:23-CV-03009-JRT-JFD

*Plaintiffs,*

v.

AGRI STATS, INC.,

*Defendant.*

**JOINT MOTION REGARDING CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following motion:

- Non-Party Todd Fawver's Motion to Quash Deposition Subpoena, ECF No.

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Pursuant to Local Rule 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

DKT NO.	DKT. NO. OF REDACTED DOCUMENT (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY:	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
269		Exhibit 1 to the Declaration of Davida S. McGhee Williams in Support of Non-Party Todd Fawver's Motion to Quash Deposition Subpoena (August 31, 2022, Deposition Transcript of Todd Fawver, <i>In re Turkey Antitrust Litigation</i> , Case No. 19-cv-08318 (N.D. Ill.)).	Non-party Todd Fawver takes the position that this document should remain sealed.	Cargill, Incorporated and Cargill Meat Solutions Corporation ("Cargill")	<p><b>Plaintiffs:</b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p> <p><b>Todd Fawver:</b> The document should remain sealed because it contains discussion of competitively sensitive business information designated Highly Confidential by non-party</p>

					Cargill pursuant to the protective order entered in the <i>Turkey</i> litigation.
288	289	Plaintiffs' Memorandum in Opposition to Hormel Foods Corporation's and Todd Fawver's Motions to Quash the United States of America's Non-Party Subpoenas.	Non-party Todd Fawver takes the position that the unredacted version of this document should remain sealed.	Cargill	<p><b>Plaintiffs:</b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p> <p><b>Todd Fawver:</b> The unredacted document should sealed because it quotes from documents properly filed under seal because of their competitively sensitive business information designated Highly Confidential by non-party Cargill pursuant to protective orders entered in this litigation and the <i>Turkey</i> litigation. A redacted version of the document is publicly available.</p>
291-2		Exhibit 6:  Presentation Deck entitled: Cargill Turkey & Cooked Meats – Agri Stats Review Retail Sales Meeting dated	Non-party Todd Fawver takes the position that this document should remain sealed.	Cargill	<p><b>Plaintiffs:</b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p> <p><b>Todd Fawver:</b> The document should remain sealed because</p>

		07/08/2014 bearing beginning bates number: CMS0000259589.			it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in the <i>Turkey</i> litigation.
291-3		Exhibit 7:  Email from Jennifer Stone to Andrew Lonneman re Annual Agristats Sales Review – Recap dated 03/20/2018 bearing beginning bates number: USAAGRISTATSCMSC000 0002014.	Non-party Todd Fawver takes the position that this document should remain sealed.	Cargill	<p><b>Plaintiffs:</b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p> <p><b>Todd Fawver:</b> The document should remain sealed because it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in this litigation.</p>
291-4		Exhibit 8:  Meeting Invitation from Jennifer Stone to Jennifer Stone, John Niemann,	Non-party Todd Fawver takes the position that this	Cargill	<p><b>Plaintiffs:</b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p>

	<p>Andrew Lonneman, Todd Fawver, and Timothy Maupin re AgriStats Discussion dated 03/07/2018 bearing bates number: USAAGRISTATSCMSC000 0000362.</p>	<p>document should remain sealed.</p>		<p><b>Todd Fawver:</b> The document should remain sealed because it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in this litigation.</p>
291-5	<p>Exhibit 9:</p> <p>Meeting Invitation from Jennifer Stone to Jennifer Stone, John Niemann, Todd Fawver, Timothy Maupin, and Andrew Lonneman re AgriStats Discussion with Stacey dated 03/08/2018 bearing bates number: USAAGRISTATSCMSC000 0000363.</p>	<p>Non-party Todd Fawver takes the position that this document should remain sealed.</p>	Cargill	<p><b>Plaintiffs:</b> Plaintiffs do not oppose Todd Fawver's request that this document remain under seal.</p> <p><b>Todd Fawver:</b> The document should remain sealed because it contains discussion of competitively sensitive business information and has been designated Highly Confidential by non-party Cargill pursuant to the protective order entered in this litigation.</p>

Dated: April 1, 2025

Respectfully submitted,

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